

CORRES. CONTROL  
OUTGOING LTR NO.

DOE ORDER #

04RF00961



September 21, 2004

04-RF-00961

| DIST.            | LTR | ENC |
|------------------|-----|-----|
| DIETER, T. J.    |     |     |
| FERRERA, D.W.    |     |     |
| GIACOMINI, J. J. |     |     |
| LINDSAY, D. C.   |     |     |
| LONG, J. W.      |     |     |
| MARTINEZ, L.A.   |     |     |
| LYLE, J. L.      |     |     |
| PIZZUTO, V. M.   | X   |     |
| SHELTON, D.C.    |     |     |
| SPEARS, M.S.     |     |     |
| TUOR, N.R.       |     |     |

Ronald G. Bostic  
Director, Authorization Basis Division  
DOE, RFPO

# NOTIFICATION OF INTENT TO DECLARE BUILDING 707 OPERATIONALLY CLEAN -- VMP-029-04

This letter transmits to the Department of Energy, Rocky Flats Project Office, notification of intent to declare all areas of Building 707 Operationally Clean in accordance with Technical Safety Requirements (TSR) Administrative Controls (AC) 5.5, *Operationally Clean*. TSR AC 5.5.1.1 requires notification to DOE at least 7 calendar days prior to declaring an area Operationally Clean and discontinuing TSR requirements.

The following Building 707 TSR requirements will be discontinued in Building 707 by declaring all areas Operationally Clean. The safety functions that were ensured by the TSR requirements will continue to be provided by the Site Safety Management Programs as described in the DBIO and the Site Safety Analysis Report, and as summarized below:

## LCO 3.1.1, Confinement Pressure Differential; LCO 3.1.2, Confinement Exhaust Filtration; DF 6.1, Periphery Confinement Barriers

Confinement of airborne radiological contamination will be ensured by the Radiological Protection Safety Management Program (SMP) which ensures that the periphery confinement barrier remains intact and the exhaust ventilation/filtration system remains operable until decommissioning progresses to the point that the final exhaust plenums must be removed. To ensure the adequacy of the exhaust ventilation system, the building pressure differential with respect to atmosphere will be monitored periodically (typically about every four hours while decommissioning activities are on-going) to ensure the confinement function is maintained.

Configuration Management SMP will ensure the design features of the periphery confinement barrier and ventilation systems are maintained such that the ventilation/filtration system effectively contains radiological releases consistent with the building leak path factors used in the accident analysis.

## LCO 3.2, Fire Sprinkler Systems; AC 5.3.1, Combustible Material Controls; AC 5.3.2, Hot Work Controls; AC 5.3.3, Material Combustibility Controls (except AC 5.3.3.3); AC 5.3.4, Flammable/Explosive Gas Controls

The Fire Protection and Configuration Management SMPs will ensure that fire systems remain functional where needed because the fire loading or emergency egress conditions require them. Combustible controls will continue to be monitored by periodic surveillances (Procedure PRO-1514-CC-707/776), and the Fire Safety Officer and job supervisors will continue to enforce daily compliance to combustible controls. AC 5.3.3.3, *Material Combustibility Controls*, will continue to prohibit wooden waste crates in Building 707/707A.

Kaiser Hill Company, L.L.C.

Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden CO 80403-8200 • 303 • 440

B707-A-000117

ADMIN RECORD

AUTHORIZED CLASSIFIER

*[Signature]*  
9/20/04

Date

IN REPLY TO RFP CC  
NO:

ACTION ITEM STATUS

☐ PARTIAL/OPEN

☐ CLOSED

LTR APPROVALS:

ORIG &amp; TYPIST INITIALS

MAC: cms

1/3

AC 5.1.1, Minimum Staffing

Qualified Station Operating Engineers will be available as needed to provide operational support to utilities as well as perform the periodic pressure differential surveillances. Configuration Control Authority (CCA) personnel will continue to manage activities within the facility through application of Conduct of Operations in accordance with Site procedures.

Building 707 Facility Management will implement and document the requirements for Operationally Clean in all areas of Building 707 by completing Appendix 1 of Procedure PRO-1557-CLEAN-707, *Building 707 Operationally Clean Determination and Declaration Checklist*. This completed checklist will be provided to you and to the Building 707 Facility Representative upon its completion on September 22, 2004.

One condition of Operationally Clean is that all waste containers are removed from the building. This means that waste generation activities must be curtailed until DOE agrees with the Operationally Clean declaration. The 707 Closure Project Management requests that DOE support an accelerated agreement of the Operationally Clean status of Building 707 to reduce the impact on on-going decommissioning activities in the facility.

The following information is provided to clarify potential areas of concern during the walkdown. Two criteria of Operationally Clean are (1) that contaminated process equipment and components (e.g., tanks, piping, gloveboxes, B-boxes, hoods, contaminated ductwork, contaminated portions of filter plenums, and contaminated HEPA filters) have been dismantled, packaged as waste, and removed from the affected area, and (2) no containerized radioactive waste is stored or staged in the affected area. Building 707 final decontamination activities require further use of equipment that may be considered to be process equipment or containerized radioactive waste. Examples include vacuum cleaners with receiver containers; concrete shaving equipment with dust receiver chambers and partially filled disposal containers; hoses and drums for hydrolazer and concrete saw operations that are used to collect and transfer water to the outdoor storage tanks; air movers with installed HEPA filters. These equipment and containers may have some accumulated waste with very low concentrations of radioactive hold-up material. Building 707 management believes it is not necessary to empty these equipment and collection and transfer containers because the quantities of radiological material are very small and would result in inefficient waste shipment practices and imprudent risk to the workers. The equipment must remain in the building to accomplish further mission activities.

Another concern that needs clarification is the potential to discover contamination in or on equipment that was initially characterized to be radiologically "clean", based on process knowledge and survey sampling data. KH believes that the intent of the TSR Operationally Clean approach was to minimize the size reduction of highly contaminated components in areas that had allowed TSR controls to be exempted, based on a determination of Operationally Clean. In accordance with conversations with RFPO personnel, the occasional discovery of low-level contamination on the outside of ducts, piping, or other equipment thought to be radioactively clean would not be considered a TSR non-compliance. The specific, contaminated equipment need not be listed on the Operational Clean Surveillance checklist, because it was initially characterized as clean, even if later determined to have very low levels of contamination.

Ronald G. Bostic  
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Thank you for your assistance in clarifying the above concerns and in completing this milestone in the Building 707 mission. Please contact Mac Carman at 303-994-3517 if you have any questions concerning this notification.

*David C. Alkred for*

Victor M. Pizzuto  
Project Manager  
Building 707/776/777 Closure Project

MAC:cms

Orig. and 1 cc – Ronald Bostic

cc:

Jimmy Coaxum  
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DOE, RFPO  
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